

MORITT HOCK & HAMROFF LLP

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

Chapter 11

BED BATH & BEYOND INC., et al.

Case No. 23-13359 (VFP)

Debtor.

(Joint Administration Requested)

Hearing Date: August 22, 2023 at 10:00 am

Oral Argument Requested

NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY

PLEASE TAKE NOTICE that non-party Mara Sirhal (“Sirhal”) will move before the Honorable Vincent F. Papalia on August 22, 2023, at 10:00 a.m. or as soon thereafter as counsel may be heard, at the United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey, for entry of an order modifying the automatic stay to allow certain claims to proceed against Debtor, Bed Bath & Beyond Inc. (“Debtor”), in the Superior Court of New Jersey proceeding entitled *Bed Bath & Beyond, Inc. v. Mara Sirhal*, Docket No. UNN-L-01291-23, Union County, pursuant to 11 U.S.C. § 362(d).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely upon the Notice of Motion for Relief from the Automatic Stay, Memorandum of Law

and Certification of Mara Sirhal, with exhibits annexed thereto, which sets forth the relevant factual and legal bases upon which the relief requested should be granted. A proposed order granting the relief requested in the Motion is also being submitted.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing, (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the “General Order”) and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the “Supplemental Commentary”) (the General Order, the Supplemental Commentary, and the User’s Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order and the Supplemental Commentary, so as to be received no later than seven (7) days before the hearing date set forth above.

PLEASE TAKE FURTHER NOTICE that copies of all documents filed in these chapter 11 cases may be obtained free of charge by visiting the website of Kroll Restructuring Administration, LLC at <https://restructuring.ra.kroll.com/bbby>. You may also obtain copies of any pleadings by visiting the Court’s website at <https://www.njb.uscourts.gov> in accordance with the procedures and fees set forth therein.

PLEASE TAKE FURTHER NOTICE that, unless responses are timely and properly filed and served, the Motion shall be decided on the papers in accordance with D.N.J. LBR 9013-3(d), and the relief requested may be granted without further notice or hearing.

Date: July 31, 2023
New York, New York

Respectfully submitted,

MORITT HOCK & HAMROFF LLP

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